

NATALIE K. WIGHT, OSB #035576
United States Attorney
District of Oregon

GAVIN W. BRUCE, OSB #113384
Assistant United States Attorney
Gavin.Bruce@usdoj.gov

CAMERON A. BELL
Trial Attorney-Civil Rights Division
Cameron.Bell@usdoj.gov
405 East 8th Avenue, Suite 2400
Eugene, Oregon 97401
Telephone: (541) 465-6771
Attorneys for the United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 3:22-cr-00084-SI

v.

JOINT STATUS REPORT

TONY DANIEL KLEIN,
Defendant.

In advance of the December 22, 2022, Pretrial Conference and Hearing on Outstanding Motions, the parties provide the following report:

The parties conferred and can confirm that there are no outstanding motions or anticipated issues that the Court will need to resolve at the upcoming hearing. The parties are prepared to proceed with trial on July 10, 2023, and have no objections to, or requested modifications of, the existing pretrial briefing schedule. If any issues requiring the Court's involvement arise before the next pretrial deadline on March 8, 2023, the parties will notify the

Court expeditiously. The parties are amenable to vacating the December 22, 2022, hearing if the Court deems it appropriate.

The government notified defense that it will be providing additional discovery, which includes *Jencks* material. This additional discovery is not expected to be voluminous.

Given the substance and expected length of trial, the parties jointly request a larger jury pool in this case. Additionally, the parties have agreed to work together to provide the Court with a proposed jury questionnaire that they request be sent out to the jury pool prior to trial. The parties will submit the proposed jury questionnaire by March 8, 2023, unless the court orders otherwise.

Dated: December 20, 2022

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
GAVIN W. BRUCE
Assistant United States Attorney

/s/ Amanda A. Thibeault
AMANDA A. THIBEAULT
Attorney for Defendant

/s/ Cameron A. Bell
CAMERON A. BELL
Trial Attorney
Civil Rights Division

/s/ Matthew McHenry
MATTHEW MCHENRY
Attorney for Defendant